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May 12, 2021

Honorable William H. Pauley, III
United States District Court - Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 20B
New York, NY 10007-1312

Re: *Baez, et al. v. New York City Housing Authority (NYCHA)*, No. 13-cv-8916 (WHP)

Dear Judge Pauley:

This letter is written on behalf of all parties in accordance with the Court's Opinion and Order dated April 12, 2021, which directed the parties to submit a joint letter memorandum by May 12, 2021 stating whether the parties intend to "propose either a further revised consent decree that includes all class members or a proposed pre-trial schedule for litigating this action."

The parties are currently engaging in good faith negotiations and hope to be able to present a proposal to the Court for its consideration in the coming weeks. The parties are mindful of the important issues at stake in this matter. As such, the parties will endeavor to reach a resolution expeditiously. Should the parties be unable to reach mutually-agreeable terms on or before June 14, 2021, the parties will submit a joint memorandum proposing next steps in this litigation.

Respectfully submitted,

/s/ Gregory Bass

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